



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

RQ-2

OCT 19 1994

William J. McManus, Treasurer
Republican National Committee - RNC
310 First Street, SE
Washington, DC 20003

Identification Number: C00003418

Reference: August Monthly Report (7/1/94-7/31/94)

Dear Mr. McManus:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule H3 of your report discloses transfers received from your non-federal account for fundraising activity which occur outside the permissible transfer period. Please be advised that transfers for shared activity must be made within a 70-day time period: no more than 10 days before or 60 days after the payment to the vendor. 11 CFR §§106.5(g)(2) and 106.6(e)(2). Please clarify the nature of these transfers-in from the non-federal account.

The Commission recommends that you immediately transfer the total amount received by your federal account outside the 70-day time period back to your non-federal account. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

-Schedule B supporting Line 22 (pertinent portion(s) attached) discloses \$12,000.00 in disbursements to the RNSEC for a transfer. You are advised that 11 CFR §102.5 prohibits a non-federal account from financing activity in connection with federal elections. Please provide clarifying information regarding these transactions including the date(s) when the original activity was conducted by the non-federal account. In addition, if any of the disbursements disclosed on Schedule B supporting Line 22 were made to influence the election or defeat of specific federal candidates, the disbursements should be allocated accordingly and disclosed as either in-kind contributions on Schedule B

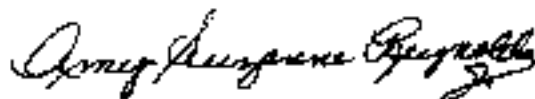
supporting Line 23, or as coordinated expenditures on
Schedule F supporting Line 25. 11 CFR §§104.3(b)(3) and
106.1

Although the Commission may initiate legal action
regarding the activities conducted by your non-federal
account, any clarifying information that you can provide
will be taken into consideration.

-Please provide further clarification of the \$165,647.13
refund from and subsequent \$165,647.13 disbursement to
Saatchi & Saatchi for coordinated expenditure activity
in the 1992 general election.

A written response or an amendment to your original report(s)
correcting the above problem(s) should be filed with the Federal
Election Commission within fifteen (15) days of the date of this
letter. If you need assistance, please feel free to contact me on
our toll-free number, (800) 424-9530. My local number is (202)
219-3580.

Sincerely,



Amy Suzanne Reynolds
Reports Analyst
Reports Analysis Division

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